

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

ANGEL FIRE WATER CO., LLC

Debtor.

No. 13-10868-T7

MOTION TO SELL ESTATE'S INTEREST IN ASSETS

COMES NOW, the Trustee, Yvette J. Gonzales, by and through her attorneys Yvette J. Gonzales LLC, and respectfully requests that this Honorable Court enter an Order allowing her to Sell the Estate's interest in all personal property, to BAFFCO Enterprises, LLC ("Buyer"). As grounds therefore, the Trustee would show:

1. The Debtor filed a Voluntary Petition under Chapter 11 on March 15, 2013. The case was converted to a Chapter 7 on January 20, 2015.
2. Among the assets of the estate is personal property located in Colfax County, New Mexico, which consists of equipment, supplies, records, and intangible assets. The intangible assets may include water rights and intellectual property.
3. The Buyer has offered the sum of \$55,000.00 for the all assets, AS IS WHERE IS, subject to Bankruptcy Court approval.
4. Upon information and belief, there are no liens on the property.
5. The Trustee believes that the offer is reasonable and in the best interests of the estate and creditors.
6. Pursuant to FRBP 6004(h) the Trustee requests that the 14 day stay be waived.
7. This motion will be noticed to all creditors and parties in interest.

WHEREFORE, the Trustee respectfully requests that this Honorable Court enter an Order Allowing Her to Sell the Estate's interest in personal property to the Buyer by accepting

the amount of \$55,000.00, to waive the 14 day stay, and for such other relief as the Court deems just and proper.

Submitted electronically
Yvette J. Gonzales
Yvette J. Gonzales L.L.C.
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I hereby certify that on the 17th day of April, 2015, a true and correct copy of the foregoing was delivered by US mail with proper postage, and electronic means when available to the individuals and entities listed below:

Office of the US Trustee
ustpreion20.aq.ecf@usdoj.gov

William F. Davis
Attorney for the Debtor

BAFFCO Enterprises, LLC
c/o Howard D. Bafford
PO Box 1683
Brush Prairie, WA 98606

Submitted electronically
Melanie Thompson